

Brian A. Bender, Esq. (BAB-0218)
Harris Beach PLLC
100 Wall Street
New York, New York 10005
(212) 687-0100

Attorneys for Defendant
LEFRAK ORGANIZATION, INC.

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NURY IBANEZ,

Case No.:
07-CV-5296 (AKH)

Plaintiff,

-against-

BATTERY PARK CITY AUTHORITY, EMPIRE
STATE PROPERTIES, INC., HUDSON TOWERS
HOUSING CO., INC., LEFRAK ORGANIZATION,
INC., LIBERTY TERRACE CONDOMINIUM,
MILFORD MANAGEMENT CORP., and MILSTEIN
PROPERTIES CORP.,

**NOTICE OF ADOPTION
OF ANSWER TO MASTER
COMPLAINT OF LEFRAK
ORGANIZATION, INC.**

Defendants.

PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102


(AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
September 10, 2007

Yours etc.,

HARRIS BEACH PLLC



Brian A. Bender, Esq. (BAB-0218)

HARRIS BEACH PLLC

Attorney for Defendant

LEFRAK ORGANIZATION, INC.

100 Wall Street, 23rd Floor

New York, New York 10005

(212) 687-0100

245311.1

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NURY IBANEZ,

Case No.:
07-CV-5296 (AKH)

Plaintiff,

-against-

BATTERY PARK CITY AUTHORITY, ET AL.,

Defendants.

**NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT OF
LEFRAK ORGANIZATION, INC.**

HARRIS BEACH, PLLC
Attorneys for Defendant
LEFRAK ORGANIZATION, INC.
100 Wall Street, 23rd Floor
New York, New York 10005
(212) 687-0100